

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

FILED
JUL 13 2001

Phil Lombardi, Clerk
U.S. DISTRICT COURT

ROCKLAND DEJARIO JOHNSON,)

Plaintiff,)

vs.)

LAUREL BARTON LEDBETTER,)

Defendant.)

01 CV 0511C (M)

Case No. _____

COMPLAINT

Comes now the Plaintiff herein, and for his cause of action against the Defendant,
and alleges and states:

1. That the Plaintiff is a citizen of the United States, and a resident of the Northern District, and the Defendant is a law enforcement officer, acting under color of state law, in the Northern District, and all acts or omissions occurred in the Northern District, thus jurisdiction and venue are proper.

2. That within the limitations period next preceding the filing of this action, the Defendant engaged in conduct, under color of state law, which was designed to, and which did in fact, deprive the Plaintiff of civil rights guaranteed to him by the United States Constitution, and the Amendments thereto.

3. That specifically, the Defendant accused the Plaintiff of committing two murders, in the Northern District, knowing full well that the Plaintiff in fact did not commit those crimes, and

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4. The defendant used force, threats and other coercion against another United States citizen, one Kejuan Reed, to force the said Reed to testify falsely against the Plaintiff, and to falsely say, under oath, that the said reed heard the Plaintiff confess to the crimes, when in fact the said reed heard no such statement, or any other statement by the Plaintiff concerning the murders for which the Defendant blamed Plaintiff.

5. That the Defendant threatened to prosecute the said Reed's mother, unless he cooperated and testified against the Plaintiff.

6. That the Defendant thus caused the Plaintiff to be arrested and jailed, and charged with two counts of murder.

7. That because the Defendant's knowingly false allegations were made known in the community, the Plaintiff was attacked at his own residence, by two individuals who were believed to be friends of the two murder victims the Plaintiff was falsely accused of killing by the Defendant.

8. That the Plaintiff has thus been, by the actions of the Defendant, deprived of constitutional rights to be free from unlawful search, seizure and arrest, freedom of association, freedom to travel in interstate commerce, and various other freedoms guaranteed by the Constitution of the United States, and the Amendments thereto.


9. That the Defendant is thus liable to the Plaintiff for actual damages in an amount in excess of ONE MILLION DOLLARS, for which the plaintiff NOW PRAYS.

10. That The acts of the Defendant were wilful, wanton and malicious, or grossly negligent, giving rise to a claim by the Plaintiff against the Defendant, for punitive

punitive damages, in excess of ONE MILLION DOLLARS, for which Plaintiff prays.

WHEREFOR Plaintiff prays for judgement against the Defendant for an amount in excess of ONE MILLION DOLLARS actual, and in excess of ONE MILLION DOLLARS punitive, for costs of this action, and for a reasonable attorney's fee, and for all other relief at law or in equity.

Respectfully submitted,



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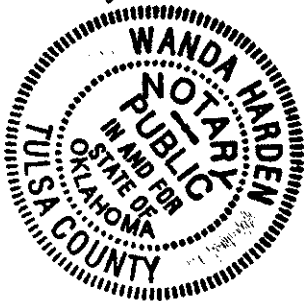
ATTORNEY FOR PLAINTIFF

VERIFICATION

I, Rockland DeJario Johnson, Plaintiff herein, certify that on this 9 day of July, 2001, have read the above and foregoing instrument and that the statements contained therein are true and correct to the best of my knowledge and belief.

Rockland DeJario Johnson
Rockland DeJario Johnson, Plaintiff

SUBSCRIBED AND SWORN to before me this 9 day of July, 2001.



Wanda Harden
Notary Public

My Commission Expires:

July 8, 2003